

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: MERIT LEASING CO. INC. MERIT INTERNATIONAL LEASING CO. INC DEBTOR(S)	CASE NUMBER: 07-04576-ESL (Chapter 7) ASSET CASE
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**TRUSTEE’S OBJECTION TO CLAIMS NUMBER 6, 8, 9 AND 11
PURSUANT FEDERAL BANKRUPTCY PROCEDURE RULE 3007**

TO THE HONORABLE COURT:

Now comes, Jorge Luis Gerena Méndez, Chapter 7 Trustee, and very respectfully states and prays as follows:

FIRST: The appearing Trustee objects and requests the disallowance of Claim #6 filed by PRAMCO CV 7, LLC for the following reason:

The claim is not secured by property of the estate for the Trustee abandoned the account receivables on October 18, 2007. Furthermore, PRAMCO received authorization from this Honorable Court to withdraw the proceeds of the contracts from Santander Bank on August 4, 2008. See Dockets 64 & 68. Therefore, claim #6 must be disallowed.

SECOND: The appearing Trustee objects and requests the disallowance of Claim number 8 filed by PRIDCO for the following reason:

As part of a stipulation approved by this Honorable Court on April 20, 2010 PRIDCO agreed to amend its claim as an unsecured claim for the sum of \$35,511.57 upon receiving the sum of \$12,500 by the Trustee. However, PRIDCO has failed to act according to the stipulation. Therefore, claim number 8 filed by PRIDCO must be forthwith disallowed.

THIRD: The appearing Trustee objects and requests the disallowance of Claim #9 filed by ADA LUZ SANCHEZ SANTIAGO for the following reason:

This claim does not qualify as a priority claim pursuant 507(a) (4). The filing of an administrative discrimination complaint does not entitle her to receive funds under a priority status. Furthermore, her \$325,000 request is exaggerate since she was fired on May 23, 2007, almost three months before the filing of the voluntary petition. Therefore, claim #9 must be disallowed.

FOURTH: The appearing Trustee objects and requests the disallowance of Claim #11 filed by Remaches de P.R., Inc. for the following reason:

The claim is not secured by property of the estate for the Trustee. Through a stipulation approved by this Honorable Court the Trustee and Remaches recognized that there was a sale to Remaches of the property. Therefore, claim #11 must be disallowed.

Wherefore, it is very respectfully requests from this Honorable Court that unless a written request for hearing on opposition to these objections is filed by claimants, to disallow the aforementioned **claims numbers 6, 8, 9 and 11.**

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico on March, 2011.

S/ Jorge Luis Gerena Méndez

Jorge Luis Gerena Méndez, Esquire
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NOTICE TO CREDITORS AND PARTIES IN INTEREST

"CREDITORS AND PARTIES IN INTEREST ARE NOTIFIED THEY HAVE THIRTY (30) DAYS TO FILE AN OBJECTION OR REPLY TO THIS MOTION, AND IF NOT SUCH MOTION IS FILED THE COURT MAY

ENTER AN ORDER GRANTING THIS MOTION OBJECTING TO **claims numbers 6, 8, 9 and 11** WITHOUT FURTHER NOTICE OR HEARING.”

CERTIFICATE OF SERVICE

I hereby that on this same date a true and correct copy of the present motion was sent on this date through regular mail to creditors claimants **PRAMCO CV, LLC, 230** Crosskeys Office Park, Fairport, NY 14450; **CHARLES P. GILMORE**, Citibank Towers, Suite 1701, #252 Ponce De Leon Avenue, San Juan, P.R. 00918; **REMACHES DE PUERTO RICO, INC., ONEILL & BORGES, ATTORNEY DAVID P. FREEDMAN**, 250 Munoz Rivera Avenue, Suite 800, San Juan, Puerto Rico 00918-1813; **Puerto Rico Development Corporation(PRIDCO)**, P.O. Box 362350, San Juan, Puerto Rico 00936-2350; **WILLIAM M. VIDAL CARVAJAL, Attorney for PRIDCO**, MCS Plaza, 255 Ponce De Leon Avenue, Suite 801, San Juan, P.R. 00917; and to all creditors and parties in interest as the addresses that appear in the master address list of record.

In San Juan, Puerto Rico on March 7, 2011.

S/ Jorge Luis Gerena Méndez

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